

DISTRICT OF COLUMBIA COURT OF APPEALS

Quintanilla v. United States

62 A.3d 1261 (D.C. 2013) · Decided March 21, 2013

SUMMARY

The District of Columbia Court of Appeals held that the evidence was insufficient to establish the “significant bodily injury” element of felony assault. The victim’s injuries, treated with cold compresses and without hospitalization or medical treatment aimed at preventing lasting harm or severe pain, did not meet the statutory definition. The court reversed the felony-assault conviction and remanded for entry of a conviction and sentence for simple assault.

CASE DETAILS

COURT	District of Columbia Court of Appeals
WRITING FOR THE COURT	Ferren, Senior Judge; Blackburne; Ferren; Fisher; Rigsby
JURISDICTION	District of Columbia
DECIDED	March 21, 2013
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	After a jury convicted appellant of several offenses arising from a robbery, including felony assault with significant bodily injury, appellant appealed only the felony-assault conviction, challenging the sufficiency of the evidence.
STANDARD OF REVIEW	The court viewed the evidence in the light most favorable to the government, deferred to the jury's determinations of witness credibility and factual inferences, and reversed if no evidence supported a reasonable inference of guilt as to each element of the offense.
PRECEDENTIAL VALUE	Published precedential opinion
PARTIES	Quintanilla v. United States

TOPICS

- criminal procedure
- appellate procedure
- standard of review
- statutory interpretation
- evidence

PRACTICE AREAS

- criminal law
- appellate practice
- statutory interpretation
- evidence

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to prove that Roth suffered a significant bodily injury, as required for felony assault under D.C. Code § 22-404(a)(2).
2. Whether the proper disposition for insufficient evidence of felony assault was reversal of that conviction and remand for entry of a conviction for the lesser included offense of simple assault.

HOLDINGS

1. An injury is a significant bodily injury under D.C. Code § 22-404(a)(2) only when, viewed objectively in the ordinary course of events, its nature requires hospitalization or immediate medical attention. Medical attention means treatment necessary to preserve the individual's health and well-being, including treatment to prevent long-term physical damage, disability, disfigurement, or severe pain; mere diagnosis, monitoring, cold compresses, bandages, or self-administered over-the-counter medication do not ordinarily satisfy that standard.
2. The evidence was legally insufficient to support appellant's conviction for felony assault because Roth's injuries did not constitute significant bodily injury as a matter of law.
3. Because the evidence was sufficient to support simple assault, the court reversed the felony-assault conviction and remanded for entry of a conviction, including sentencing, for simple assault.

KEY QUOTATIONS

"We concluded that bodily injury will be "significant," within the meaning of the statute, whenever "the nature of the injury itself" would lead to "the practical need in the ordinary course of events for prompt medical attention."" (62 A.3d at 1264)

"Treatment is not "medical," therefore, if applied to lesser, short-term hurts." (62 A.3d at 1265)

"The jury, therefore, as a matter of law, could not have found appellant guilty of felony assault" (62 A.3d at 1266)

FACTUAL BACKGROUND

During a robbery, Caroline Roth suffered head and hand injuries. Her head throbbed and remained tender for approximately a week and a half, her fingers remained swollen for about three weeks, and an index finger was almost unusable and painful for about two months. Emergency medical technicians examined her, applied cold compresses, and told her she probably did not have a concussion or broken finger; she declined hospital transportation, received no further professional treatment, and used ice and aspirin.

PROCEDURAL HISTORY

A jury convicted appellant of robbery, misdemeanor receipt of stolen property, felony receipt of stolen property, and felony assault with significant bodily injury. The District of Columbia Court of Appeals held that the evidence was legally insufficient to establish significant bodily injury, reversed the felony-assault conviction, and remanded for entry of a conviction and sentence for simple assault, a lesser included offense.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Reverse the felony-assault conviction and remand for entry of a conviction and sentencing for simple assault.

CASES CITED

- Earle v. United States, 612 A.2d 1258, 1265 (D.C. 1992)
- In re L.L., 974 A.2d 859, 866 (D.C. 2009)
- Lewis v. United States, 767 A.2d 219, 222 (D.C. 2001)
- Jackson v. United States, 940 A.2d 981, 986-87 (D.C. 2008)
- Nixon v. United States, 730 A.2d 145, 149-50 (D.C. 1999)
- Colter v. United States, 37 A.3d 282, 285 (D.C. 2012)
- In re R.S., 6 A.3d 854, 857-59 & n.3 (D.C. 2010)
- In re R.P., 136 Daily Wash. L. Rptr. 549, 552 (D.C. Super. Ct. 2008)
- Flores v. United States, 37 A.3d 866, 867 (D.C. 2011)